



REDACTED – FOR PUBLIC INSPECTION

April 18, 2017

Erratum

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: **Erratum to Notification of Non-Substantive Change to ClearCaptions'
Ownership Structure
CG Docket Nos. 03-123 & 10-51**

Dear Ms. Dortch:

On March 9, 2017, ClearCaptions, LLC filed a notification of non-substantive change in the company's ultimate ownership. Certain confidential information in that filing was inadvertently unredacted. The corrected version is enclosed and replaces, in its entirety, the version that was filed previously.

Respectfully submitted,

/s/ Michael Strecker

Michael Strecker
Vice President of Regulatory
ClearCaptions, LLC
595 Menlo Drive
Rocklin, CA 95765

March 9, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: **Request for Confidential Treatment**
Notification of Non-Substantive Change to ClearCaptions' Ownership Structure
CG Docket Nos. 03-123 & 10-51

Dear Ms. Dortch:

ClearCaptions, LLC (ClearCaptions), pursuant to Sections 0.457 and 0.459 of the Federal Communications Commission's (FCC or Commission) rules, respectfully requests confidential treatment of certain information contained in the enclosed notification of non-substantive change in ClearCaptions' ultimate ownership (the "Notice").¹ The Notice concerns non-substantive changes to ClearCaptions' ownership resulting from ZVRS Holding Company's acquisition of Purple Communications, Inc. ("PCI") on February 14, 2017.²

ClearCaptions requests confidential treatment of all information contained after the heading *****BEGIN CONFIDENTIAL***** and before the close heading *****END CONFIDENTIAL*****. As described below, all material contained inside those headings is proprietary commercial and business information that is not customarily disclosed to the public or within the industry and is subject to Exemption 4 under the Freedom of Information Act (FOIA).³ The confidential information has been redacted from the version electronically filed with the Commission.

1. Identification of the specific information for which confidential treatment is sought.

ClearCaptions requests confidential treatment of all information contained after the heading *****BEGIN CONFIDENTIAL***** and before the close heading *****END**

¹ See 47 C.F.R. §§ 0.457, 0.459.

² See Purple Communications, Inc., Notification of Substantive Change, CG Docket Nos. 10-51 & 03-123 (Mar. 1, 2017); see also ZVRS, Notice of Non-Substantive Change, CG Docket Nos. 10-51 & 03-123 (Mar. 1, 2017).

³ 5 U.S.C. § 552(b)(4).



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CONFIDENTIAL***, which has been redacted in the version of this Notice filed electronically with the Commission.

2. Identification of the circumstance giving rise to the submission.

ClearCaptions is submitting the enclosed Notice to provide current information to the Commission regarding ClearCaptions' ultimate ownership in light of ZVRS Holding Company's acquisition of PCI on February 14, 2017.

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.

The confidential information in the enclosed Notice is sensitive commercial information specific to the corporate structure of ClearCaptions. This information is generally safeguarded from competitors and is not made available to the public.

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The confidential information concerns Internet Protocol Captioned Telephone Service, a nationwide competitive service.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the confidential information could cause substantial competitive harm to ClearCaptions because it would provide competitors with insight into ClearCaptions' confidential corporate and structural information that is not generally available in the market, which would work to ClearCaptions' severe competitive disadvantage.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.

ClearCaptions routinely treats the confidential information as confidential and exercises significant care to ensure that such information is not inadvertently disclosed to its competitors or the public.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

ClearCaptions does not make the confidential information available to the public, and this information is not generally disclosed to third parties.



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8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

ClearCaptions requests that the confidential information be treated as confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to ClearCaptions.

If a request is submitted for disclosure of this information, please provide sufficient notice to the undersigned to allow ClearCaptions to take appropriate steps to safeguard the confidentiality of the information. In addition, should this request for confidentiality be denied, ClearCaptions requests that this information be returned by the Commission without consideration.

Respectfully submitted,

/s/ Michael Strecker

Michael Strecker
Vice President of Regulatory
ClearCaptions, LLC
595 Menlo Drive
Rocklin, CA 95765

March 9, 2017

Eliot Greenwald
Deputy Chief, Disability Rights Office
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: **Notification of Non-Substantive Change to ClearCaptions' Ownership Structure**
CG Docket Nos. 03-123 & 10-51

Dear Mr. Greenwald:

ClearCaptions, LLC (ClearCaptions) hereby notifies the Federal Communications Commission (FCC or Commission) that, effective February 14, 2017, ClearCaptions' ownership structure has undergone the following organizational changes.

First, Purple Communications, Inc. ("PCI") distributed ClearCaptions equity to Purple Intermediate Holding Co., Inc. ("PIHC"). After the distribution of ClearCaptions equity to PIHC, PIHC contributed the equity of PCI to ZVRS Holding Company in exchange for a minority interest in ZP 2016 Holdings, LLC.¹ Additionally, the following parent company names were changed as part of this transaction:²

- Purple Intermediate Holding Co., Inc. was changed to VRS-CC Intermediate Holding Co., Inc.
- Purple Holding Co., LLC was changed to VRS-CC Holding Co., LLC

Next, Clearlake Capital Partners I, LP distributed all interest in VRS-CC Holding Co., LLC ("VRS-CC HC") to newly formed Reservoir VRS-CC SPV, LLC. Reservoir VRS-CC SPV, LLC is owned by multiple Funds, all of which are controlled by Reservoir Capital Partners, LP. Reservoir Capital Partners, LP is the General Partner of Reservoir VRS-CC SPV, LLC.³

¹ See Purple Communications, Inc., Notification of Substantive Change, CG Docket Nos. 10-51 & 03-123 (Mar. 1, 2017); *see also* ZVRS, Notice of Non-Substantive Change, CG Docket Nos. 10-51 & 03-123 (Mar. 1, 2017).

² See Exhibit 2.

³ See Exhibit 3.



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Exhibit 4 reflects the final state of ClearCaptions ownership and organizational structure effective as of February 14, 2017.

ClearCaptions does not expect this non-substantive change to affect its compliance with the mandatory minimum standards applicable to its provision of Internet Protocol Captioned Telephone Service.

Respectfully submitted,

/s/ Michael Strecker

Michael Strecker
Vice President of Regulatory
ClearCaptions, LLC
595 Menlo Drive
Rocklin, CA 95765



ClearCaptions™

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Exhibit 1

Original State

*****Begin Confidential*****

*****End Confidential*****

Exhibit 2**Sale of Purple Communications, Inc.*******Begin Confidential*******Description**

- (1) Purple Communications, Inc. ("PCI") distributes ClearCaptions LLC ("CC") equity to Purple Intermediate Holding Co., Inc. ("PIHC").
- (2) PIHC contributes stock of PCI to ZP 2016 Holdings, LLC in exchange for *****BEGIN CONFIDENTIAL***** ***** END CONFIDENTIAL***** interest in ZP 2016 Holdings, LLC.
- (3) No changes to CC ownership or control.
- (4) The following parent company names were changed as part of this transaction: Purple Intermediate Holding Co., Inc. was changed to VRS-CC Intermediate Holding Co., Inc.; and Purple Holding Co., LLC was changed to VRS-CC Holding Co., LLC.

*****End Confidential*****

Exhibit 3

Clearlake Distributes Equity to Reservoir

*****Begin Confidential*****

Description

- (1) Clearlake Capital Partners I, LP distributes all interest in VRS-CC Holding Co., LLC to newly formed Reservoir VRS-CC SPV, LLC.
- (2) Reservoir VRS-CC SPV, LLC owned by Multiple Funds, all controlled by Reservoir Capital Partners, LP
- (3) Reservoir Capital Partners, LP is General Partner of Reservoir VRS-CC SPV, LLC.

*****End Confidential*****



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Exhibit 4

Final State as of February 14, 2017

*****Begin Confidential*****

*****End Confidential*****